

IN THE CIRCUIT COURT OF COOK COUNTY
COUNTY DEPARTMENT, CHANCERY DIVISION

TOWNSHIP TRUSTEES OF SCHOOLS)	
TOWNSHIP 38 NORTH, RANGE 12 EAST,)	
)	
Plaintiff,)	No. 13 CH 23386
)	
v.)	Hon. Sophia H. Hall
)	
LYONS TOWNSHIP HIGH SCHOOL)	
DISTRICT 204,)	
)	
Defendant.)	

NOTICE OF MOTION

Please take notice that on August 28, 2018, at 10:00 a.m., we shall appear before the Honorable Sophia H. Hall in Courtroom 2301 of the Richard J. Daley Center, 50 West Washington Street, Chicago, Illinois, and present the attached motion.

LYONS TOWNSHIP HIGH SCHOOL
DISTRICT 204

By s/Jay R. Hoffman
Its Attorney

Jay R. Hoffman
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CERTIFICATE OF SERVICE

Jay R. Hoffman, an attorney, certifies that on August 20, 2018, he caused the foregoing notice of motion to be served by email on the following attorneys:

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s/Jay R. Hoffman

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION

TOWNSHIP TRUSTEES OF SCHOOLS)	
TOWNSHIP 38 NORTH, RANGE 12 EAST,)	
)	
Plaintiff and Counter-Defendant,)	No. 13 CH 23386
)	
v.)	Hon. Sophia H. Hall
)	
LYONS TOWNSHIP HIGH SCHOOL)	Calendar 14
DISTRICT 204,)	
)	
Defendant and Counter-Plaintiff.)	

**DEFENDANT LT’S PAGE LIMIT MOTION FOR
ITS RESPONSE TO THE TTO’S SUMMARY JUDGMENT MOTION**

Defendant Township High School District 204 (“LT”), by its counsel, pursuant to this Court’s Standing Order, respectfully asks this Court to allow LT *instanter* to file a brief in excess of the Court’s page limit for summary judgment briefs.

The Standing Order permits summary judgment briefs of 15 pages, exclusive of fact sections. LT’s Response to TTO’s Motion for Summary Judgment is 50 pages long including extensive fact sections, but the argument sections are 18 pages in total length. A brief of this size, particularly the detailed fact sections, is necessary to address the many factual and legal points involved in the three separate Claims of the TTO (which date back to 1994 and have damage claims of about \$4.4 million), and the nine affirmative defenses of LT. LT’s response does not contain any footnotes. LT believes that 18 pages of argument is appropriate for the number and complexity of the matters involved in this case.

WHEREFORE, LT respectfully asks this Court for leave to file its response brief to the TTO’s summary judgment motion *instanter*.

Respectfully submitted,

LYONS TOWNSHIP HIGH SCHOOL
DISTRICT 204

By s/Jay R. Hoffman
Its Attorney

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